REMARKS/ARGUMENTS

Claims 1 and 3-28 were pending prior to entry of this response. Claims 1 and 3-21 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Van De Vanter, USPN 5,857,212, and Funkunaga, USPN 5,627,948. Claims 22-28 stand rejected under 35 U.S.C. 102(b) as being anticipated by WordPerfect Version 6.1 For Windows. Applicant respectfully requests that the rejections be reconsidered in light of the arguments presented below.

Rejections of Claims 22-28

The Office Action rejects Claims 22-28 under 35 U.S.C. 102(b) based upon the public use or sale of WordPerfect 6.1 For Windows. In particular, the Office Action argues that a procedure for inserting a bitmap image object in an electronic document using WordPerfect anticipates Claims 22-28. Applicant respectfully disagrees and submits that the procedure described in the Office Action is much more complicated and significantly different from the methods of Claims 22-28. Moreover, even with its complexity, the procedure described in the Office Action fails to teach the elements recited in the claims.

Independent Claim 22 is directed at a computer-implemented method for editing an electronic document that comprises "receiving a notification of an intent to create an insertion point at a cursor location in the electronic document; and if the cursor location corresponds to no existing text, automatically making formatting adjustments sufficient to create the insertion point at the cursor location." As discussed in the specification, one of the advantages of the claimed invention is to provide "an intuitive method for placing an insertion point before entering text or other elements into a document." (page 7, lines 5-10) The claimed invention also allows "easy

positioning of tables, graphics, and text by providing automatic application, or formatting, of tabs, indents, alignment and other formatting constructs." (page 7, lines 11-13)

The Office Action includes nine pages of screenshots to illustrate that WordPerfect anticipates independent Claim 22. In particular, page 3 illustrates a cursor placed at a user selected location with no text or markers; page 4 shows the activation of an insert-object command; page 5 illustrates the activation of a command to create a new bitmap image; page 6 shows the resulting input area; page 7 illustrates the activation of a create-caption command; pages 8 and 9 show a blank object having a caption with two lines where the caption happens to be near with the user selected location of page 3.

To the best of the applicant's understanding, these screenshots were intended to demonstrate a procedure in WordPerfect for adding two lines of text at a location with no existing text. This procedure contains a number of steps, which may include 1) receiving a command for inserting an object; 2) receiving a selection of a bitmap image object for insertion; 3) inserting a bitmap image object in the document; 4) receiving a command for inserting a caption for the bitmap image object; and 5) enabling the user to insert enter text for the caption. Applicant submits that the procedure illustrated by these screenshots clearly demonstrates an example of the non-intuitive and complex procedures that are required by existing word processing programs for inserting text at a location in a document with no existing text. The invention in Claim 22 is especially designed to dramatically simplify these procedures.

An exemplary application of the method of Claim 22 is illustrated in FIG. 4A and 4B of the applicant's drawings. In FIG. 4A, a cursor 420 is positioned at location with no existing text. The user double-clicked the mouse button to issue "a notification of an intent to create an

insertion point at the cursor location in the electronic document." In response to the notification, an insertion point is automatically created using paragraph marks, which are "formatting adjustments sufficient to create the insertion point at the cursor location." Applicant respectfully submits the method in Claim 22 is much more efficient than and clearly different from the WordPerfect procedure described by the Office Action. More specifically, most of the steps described in the WordPerfect example could be eliminated by simply tapping the enter key several times, which is the conventional method described by the applicant.

Applicant also submits that the WordPerfect procedure does not create an insertion point at a user-selected location with no existing text, as claimed by the Office Action. The Office Action states that item "b" on page 3 is a cursor placed at a user-selected location with no text or markers and item "a" is a present input cursor. Applicant observes that the screenshot on page 3 shows that cursor position "b" is about several lines below cursor position "a." The screenshot on page 6 clearly shows that the bitmap image object and its caption are inserted above cursor position "a" and not at cursor position "b" with no existing text. Thus, although the caption appears to be near cursor position "b", there is no "insertion point" at cursor position "b". Rather, an object is inserted at cursor position "a", and text within that object (not an insertion point in the document) appears at cursor position "b". Clearly, the WordPerfect procedure fails to create an insertion point at cursor location having no existing text, as recited in the independent Claim 22.

For the reasons stated above, applicant respectfully submits that independent Claim 22 is not anticipated or rendered obvious by WordPerfect 6.1 For Windows and is allowable. Claims 23-28 depend from Claim 22 and, thus, are allowable for at least the same reasons.

Rejections of Claims 1 and 3-21

The Final Office Action maintains the rejections of Claims 1 and 3-21 from the First Office Action dated December 11, 2001. The claims were rejected under 35 U.S.C. 103(a) as being unpatentable over Van De Vanter, USPN 5,857,212, and Funkunaga, USPN 5,627,948. Applicant respectfully submits that the rejections of Claims 1 and 3-21 have been overcome by the Response to the First Office Action filed on April 11, 2002. The arguments below will briefly point out the insufficiency of the references cited by the Office Action.

Regarding independent Claim 1, Van De Vanter does not teach "collecting context information regarding the location of the cursor in the electronic document," as recited in Step (b). Van De Vanter also fails to teach "changing a presentation of the cursor to indicate an anticipated location of the insertion point and the type of formatting that will be applied to text and objects located in close proximity to the cursor location." Van De Vanter appears to teach changing the presentation of the cursor from an arrow to an I-beam when it is over existing text. While the I-beam may indicate an anticipated location, it does not indicate "the type of formatting," as recited in Step (d). Moreover, Step (f) of Claim 1 recites "performing formatting to place the insertion point in the electronic document," which is not taught by Van De Vanter in any way.

Fukunaga fails to cure the insufficiencies of the Van De Vanter reference. Although Fukunaga appears to teach displaying margins and tabstop information at the top of the document display area, Fukunaga does not teach "collecting context information regarding the location of the cursor" or "changing a presentation of the cursor." Furthermore, even though

Fukunaga appears to display margins and tabstop information, it fails to teach "performing formatting," as recited by Claim 1.

For the reasons stated above, applicant respectfully submits that independent Claim 1 is allowable over Van De Vanter and Fukunaga. Claims 3-9 depend on Claim 1 and are thus allowable for at least the reasons just stated.

Regarding independent Claims 10, 15, and 21, the Office Action applies arguments somewhat similar to those used to reject Claim 1. Thus, relevant remarks presented above in conjunction with Claim 1 also apply to Claims 10, 15, and 21. Additional arguments regarding the insufficiency of Van De Vanter and Fukunaga are presented below.

Both Claims 10 and 15 recite "applying the collected context information to a database of a plurality of rules to determine whether the collected context information coincides with one of the plurality of rules." Neither Van De Vanter nor Fukunaga teaches this step. It appears that Van De Vanter teaches rules associated with separating two adjacent tokens. However, the rules in Van De Vanter are not associated with context information as defined by the applicant's specification. Also, Van De Vanter does not teach "determining one of a plurality of cursors associated with the coinciding rule; and displaying the associated cursor," as recited in Step (d) and (e) of Claims 10. For Claim 15, Van De Vanter fails to teach "adjusting the location of the insertion point based upon the coinciding rule," as recited in Step (d).

Accordingly, applicant respectfully submits that independent Claims 10, 15 and 21 are allowable over Van De Vanter and Fukunaga. Dependent Claims 11-14, 15-20 are thus allowable for at least the reasons just stated and those discussed in conjunction with Claim 1.

CONCLUSION

Applicants respectfully request that a timely Notice of Allowance be issued in this case.

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